

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF ARKANSAS  
TEXARKANA DIVISION**

**Nichole Y. Sartor**  
*Plaintiff,*

vs.

**Union Pacific Corporation,  
Union Pacific Railroad Company**  
*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§

**No. 06-4044**

**UNION PACIFIC CORPORATION'S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE REPLY BRIEF**

COMES NOW Defendant Union Pacific Corporation, and for its Unopposed Motion for Extension of Time to File its Reply Brief to Plaintiffs' Response to Union Pacific Corporation's Motion to Dismiss Pursuant to Fed. R. Civil P. 12(b)(2), would respectfully show the Court the following:

On September 5, 2006, Plaintiffs filed their response to Union Pacific Corporation's Motion to Dismiss Pursuant to Fed. R. Civil P. 12(b)(2). Due to conflicts in the below-signed counsel's schedule, counsel is requesting additional time to file Union Pacific Corporation's reply brief to Plaintiffs' response. Undersigned counsel has conferred with Plaintiffs' counsel and has been informed that Plaintiffs do not oppose this relief. Counsel for Union Pacific Corporation would request up to and including September 20, 2006, in which to file the reply brief.

WHEREFORE, PREMISES CONSIDERED, Union Pacific Corporation prays this Court grant its Unopposed Motion for Extension of Time to File its Reply Brief, allow Union Pacific Corporation up to and including September 20, 2006, in which to file its

reply, and grant Union Pacific Corporation all other relief to which it may prove itself entitled.

Respectfully submitted,

/s/ Sean F. Rommel

George L. McWilliams  
Arkansas Bar No. 68078  
Sean F. Rommel  
Arkansas Bar No. 94158  
Leisa B. Pearlman  
Arkansas Bar No. 92070  
Jack T. Patterson, II  
Arkansas Bar No. 95012

PATTON, ROBERTS, McWILLIAMS  
& CAPSHAW, L.L.P.  
2900 St. Michael Drive, Suite 400  
Post Office Box 6128  
Texarkana, Texas 75505-6128  
Telephone: 903-334-7000  
Facsimile: 903-334-7007

ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served upon all counsel of record in the above action who have agreed to service by electronic filing on this 13th day of September, 2006.

/s/ Sean F. Rommel  
SEAN F. ROMMEL